

EXHIBIT I

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

C.A. NO. 04-10643 MLW

JUDITH THIBEAU
and GEORGE THIBEAU,
Plaintiffs,

v.

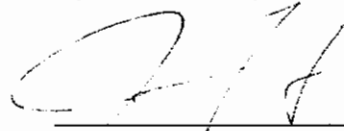
UNITED STATES OF AMERICA
and EAST BOSTON NEIGHBORHOOD
HEALTH CENTER CORPORATION
Defendants.

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS PROPOUNDED TO DEFENDANT UNITED STATES**

1. The entire Eye Clinic Manual as referred to in the deposition testimony of Dr. John Pietrantonio, on page 23 of the transcript of such deposition.
2. The entire student orientation packet provided to students of the New England College of Optometry working at the East Boston Neighborhood Health Center during September 2002, and as referred to in the deposition testimony of Dr. John Pietrantonio, on page 30-31 of the transcript of such deposition.
- 3.. The entire and current student orientation packet provided to students of the New England College of Optometry working at the East Boston Neighborhood Health Center at present, and as referred to in the deposition testimony of Dr. John Pietrantonio, on page 30-31 of the transcript of such deposition.
4. All patient examination notes made out and/or written by Richard Price (with patient names redacted) during September, October and November 2002.
5. The form that was written and/or filled out by Richard Price in response to a request by Dr.

John Pietrantonio and/or Dr. James O. Taylor and/or any other representative of the East Boston Neighborhood Health Center and/or the eye clinic of the East Boston Neighborhood Health Center as referred to in the deposition and video tape trial testimony of Richard Price which was given on July 18, 2005

Plaintiffs
Judith and George Thibau
By their attorney,

A handwritten signature in black ink, appearing to read 'J. L. Frederick', is written over a horizontal line.

James L. Frederick, Esq.
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of the foregoing pleading was served upon the following attorney(s) VIA FIRST CLASS MAIL:

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DATED: 8/1, 2005



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